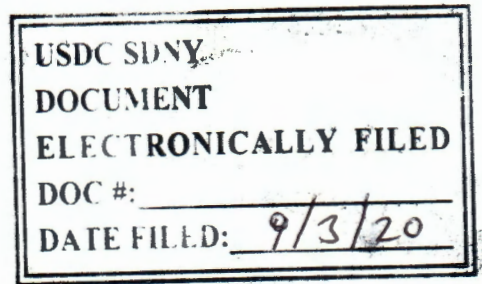


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)

**THIRD JOINT STIPULATION AND ~~PROPOSED~~ ORDER
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC ("Plaintiffs"), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. ("Defendants"), by and through their counsel, respectfully submit this Third Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. At the parties' joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing

deadlines by eight weeks, and on July 6, 2020 entered an Order modifying the case schedule by extending the existing deadline by an additional eight weeks (and nine weeks in one instance in light of the Christmas/New Year holiday).

The parties now request a third eight-week extension of the deadlines set forth below to give the parties sufficient time to complete ongoing party and third-party fact discovery on which they have been diligently working. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. This is the third time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Status conference	Friday, October 9, 2020	Friday, December 4, 2020
Fact discovery completed	Friday, October 9, 2020	Friday, December 4, 2020
Burden-of-proof expert reports	Friday, November 6, 2020	Friday, January 8, 2021
Rebuttal expert reports	Friday, December 4, 2020	Friday, February 5, 2021
Expert discovery completed	Friday, January 8, 2021	Friday, March 5, 2021

Dated: September 3, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

R. David Hosp
Elizabeth E. Brenckman
ORRICK, HERRINGTON & SUTCLIFFE LLP
51 West 52nd Street
New York, NY 10019
Tel: (617) 880-1886
(212) 506-3535
dhosp@orrick.com
ebrenckman@orrick.com

Mark S. Puzella (*pro hac vice*)
Sheryl Koval Garko (*pro hac vice*)
222 Berkeley Street, Suite 2000
Boston, MA 02116
Tel: (617) 880-1896
(617) 880-1919
mpuzella@orrick.com
sgarko@orrick.com

Mitchell L. Stoltz
Electronic Frontier Foundation
815 Eddy Street
San Francisco, CA 94109
Tel: (415) 436-9333
mitch@eff.org

*Attorneys for Defendants David R. Goodfriend
and Sports Fans Coalition NY, Inc.*

/s/ Thomas G. Hentoff

Gerson A. Zweifach
Thomas G. Hentoff (*pro hac vice*)
Joseph M. Terry (*pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC. 20005

650 Fifth Avenue
Suite 1500
New York, NY 10019

Tel: (202) 434-5000
gzweifach@wc.com
thentoff@wc.com
jterry@wc.com

*Attorneys for All Plaintiffs/Counterclaim
Defendants*

Paul D. Clement (*pro hac vice*)
Erin E. Murphy (*pro hac vice*)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, NW
Washington, DC 20004

Tel: (202) 389-5000
paul.clement@kirkland.com
erin.murphy@kirkland.com

*Attorneys for Plaintiffs Fox Television
Stations, LLC and Fox Broadcasting
Company, LLC*

On this 3rd day of September, 2020,

Approved By:

Louis L. Stanton
The Honorable Louis L. Stanton
United States District Judge